CONTINGENCY
PLAN
2012

JCI Jones Chemicals, Inc.
16248 Industrial Drive
Milford, VA 22514

25

BRANCH CONTINGENCY PLAN

Contingency Plan
Milford Branch

"It should be noted that at this time and in response to 'uncontrolled releases' of either chlorine or sulfur dioxide as defined in Chapter XIV of JCI's Contingency Plan manual, theMilford Branch does not have employees qualified, in accordance with OSHA regulations under 29 CFR 1910.120(q)(6)(iii), to participate as hazardous materials technicians to control releases of chlorine or sulfur dioxide. Given this and until such time that this happens, the immediate procedures to be followed in response to an emergency involving a release of either chlorine or sulfur dioxide at the facility are limited to calling 911. The emergency response procedures discussed in detail throughout this Branch specific Contingency Plan are to be followed once the requisite 24 hours of training has been conducted and documented and certification corresponding to this training has been issued to those employees designated as emergency responders."

JCI Jones Chemicals, Inc.
Milford Branch
Organizational Chart

Branch Manager
Mike Washington

Office Staff
Cortney Johnson

Plant Employees
Jeremiah Dawson
James Wright

Drivers
Peter Thon

Sales
Cortney Johnson

Maintenance
Gary Kohr

Branch Specific Information

BRANCH IDENTIFICATION: Milford

E.P.A. ID Number:	VA 070432059
U.S. E.P.A. Region:	3
State Environmental	Northern Region, Alexandria, VA Office.
Facility Location:	Caroline Co, Milford Virginia. 22514
Mailing Address:	16248 Industrial Dr. Milford VA, 22514
Physical Address:	16248 Industrial Dr. Milford VA, 22514
Telephone Numbers:	(804)633-5066
Office Hours:	8:00am to 5:00pm

EMERGENCY COORDINATORS:

NAME	HOME NUMBER	OFFICE NUMBER	ADDRESS
PRIMARY:			
Mike Washington	(804)572-8381 (804)994-4469	(804)633-5066	2 Tacoma Court Ruther Glen, VA 22546
ALTERNATES:			
James Wright	(804)366-8626 (804)994-4468	(804)633-5066	16404 Braswell St. Bowling Green, VA 22546

NOTE: THE EMERGENCY COORDINATOR OR AN ALTERNATE MUST EITHER BE ON THE PREMISES AT ALL TIMES OR ON CALL AND AVAILABLE TO RESPOND TO AN EMERGENCY BY REACHING THE FACILITY WITHIN A SHORT PERIOD OF TIME. THE EMERGENCY COORDINATOR, ONCE DESIGNATED, HAS THE AUTHORITY TO COMMIT THE RESOURCES NEEDED TO CARRY OUT THE CONTINGENCY PLAN.

TYPE OF FACILITY:

This facility manufactures Sodium Hypochlorite and repackages Chlorine and distributes various inorganic water treatment chemicals.

Reviews and Changes:

Plan Prepared By: Michael A. Croke — Date: May 26, 2004
Reviewed by: _____ Date: May 26, 2004

Plan Amended By: Mike Washington — Date: Oct 16, 2007
Reviewed By: _____ Date: _____

Plan Amended By: Mike Washington — Date: March 6, 2008
Reviewed By: _____ Date: _____

Plan Amended By: Mike Washington — Date: June 2, 2008
Reviewed By: _____ Date: _____

Plan Amended By: Mike Washington — Date: September 19, 2008
Reviewed By: _____ Date: _____

Plan Amended By: Mike Washington — Date: June 2, 2008
Reviewed By: _____ Date: _____

Plan Amended By: Mike Washington — Date: October 18,2009
Reviewed By: _____ Date: _____

Plan Amended By: Mike Washington — Date: July 22, 2010
Reviewed By: _____ Date: _____

Plan Amended By: Mike Washington — Date: February 10, 2011
Reviewed By: _____ Date: _____

Plan Amended By: Mike Washington — Date: May 2, 2011
Reviewed By: _____ Date: _____

Plan Amended By: Mike Washington — Date: February 21, 2012
Reviewed By: Date:

Plan Amended By: Mike Washington — Date: May 1, 2012

Reviewed By: Steve Washington Date: May 1, 2012

Plan Amended By: Date:
Reviewed By: _____ Date: _____

Plan Amended By: Date:
Reviewed By: _____ Date: _____

Plan Amended By: Date:
Reviewed By: _____ Date: _____

Plan Amended By: Date:
Reviewed By: _____ Date: _____

Emergency Telephone Numbers

CHEMTREC/CHLOREP----------800-424-9300

National Response Center----------800-424-8802

State (Hazardous Material/Hazardous Substance)----------800-468-8892
(See Environmental Manual Section IX, State Specific Spill Reporting Procedures Guides)

State (Excess Air Emissions/Wastewater Excursions)-------800-468-8892
(See Environmental Manual Section IX, State Specific Spill Reporting Procedures Guides)

State Emergency Response Commission----------800-468-8892
(See Environmental Manual Section IX, State specific Guides)

Local Emergency Planning Committee----------911

County/Local Police and Fire----------911

County/Local Health Department----------804-633-5465

County/Local Hospital (Mary Washington)---------- 540-741-1100

Occupational Safety and Health Administration----------800-282-1425

Poison Control Center----------800-672-1697

Bowling Green Utility Department---------- 804-633-5011

Jones Chemicals-Milford Office---------- 804-633-5066

Branch Manager, Mike Washington---------- 804-994-4469

Dispatcher, Trina Lopez----------804-633-5066

Jones Chemicals-Sarasota Office----------800-477-1078

Dan Casmey, Executive V.P. of Safety, Security & Regulatory Compliance. 800-521-4588, 330-472-5519

Tim Gaffney, Executive V.P. of Environmental Affairs 585-721-2263

Plant Personnel and Job Description

EMPLOYEE NAME	JOB TITLE	DESCRIPTION
**Mike Washington	Branch Manager Hazardous Waste Resp Emergency Coordinator	Supervises all branch operations, schedules all maintenance and work to be performed. Serves as Emergency Coordinator and. Will respond to Hazardous Waste spills or releases on site and take appropriate action.
Cortney Johnson	Office Manager/ Sale Coordinator	Responsible for all office functions and coordinate all branch sales activities to include bids and quotes
** James Wright	Plant Manager Emergency Coordinator "A" Emergency Responder	Responsible for all plant functions and provide customer training on safe handling of chlorine.

** Jeremiah Dawson	Plant Worker "B" Emergency Responder	Fills and processes drum material, load tankers makes bleach Operates forklift. General plant work.
Gary Kohr	Maintenance Worker	Operates forklift. General plant work. Maintenance work.
Pete Thon	Driver	Drives tractor trailer, loads and unloads tanker and trailer, operates flatbed and boom trucks.

** Member of Emergency Response Team

Hazardous Materials on Site and Location

JCI Jones Chemicals, Inc. has various hazardous materials on site. Below is a list of the hazardous materials on site, the storage location in the facility, and **normal daily anticipated quantities** on site:

COMPRESSED GASES:

Chlorine

- (2) 90 ton railcars, railcar spots #1 & #2, east side rail siding.
- (12 - 24) ton containers, inside plant or on outgoing ton rail.
- (50 - 150) cylinders, inside plant or in cylinder storage area.
- All other chlorine containers are normally 'last contained' containers and presumed empty but not totally evacuated.
- No full containers are stored outside of the building.

Sulfur Dioxide

- (8 - 12) ton containers, inside plant or on outgoing ton rail.
- (10 - 50) cylinders, inside plant or on in cylinder storage area.
- All other sulfur dioxide containers are normally 'last contained' containers and presumed empty but not totally evacuated.
- No full containers are stored outside of the building.

LIQUID PRODUCTS:

Hypochlorite Solution

- (2) 12,000 gallon bulk storage tanks, tanks #15 & #17, located in tank farm dike.
- (2) Make vats 5600 gallon tanks, tanks #8 & #9, located in the warehouse.

- (3) bleach tankers are kept on site.

Sodium Bisulfite

- Drums are not normally kept in stock. If any containers are full, they are kept in full drum storage area in plant warehouse.

Caustic Soda

- (2) 200,000# railcars, railcar spots #4, #5 , northeast rail siding.
- (2) 11,000 gallon bulk storage tanks, tanks #10 located in tank farm dike.
- (1) 5,200 gallon placarded tanker. Normally kept outside in yard.

FLAMMABLE MATERIALS:

Paint

- (12 -16) one gallon cans, flammable cabinet, right hand side of big overhead door.

Gasoline

- (3) five gallon can, flammable cabinet, right hand side of big overhead door.

Oil

- (4) five gallon can, flammable cabinet, right hand side of big overhead door.

Grease

- Multiply forty ounce tubes, flammable cabinet, right hand side of big overhead door.

Acetylene

- (2) Portable tanks, welding rig and hot work area of plant.

Forklift Propane

- (9) Portable tanks, one each on forklifts, balance in propane cage outside by truck scale.

OTHER MATERIALS:

Oxygen

- (2) Portable tanks, welding rig and valve room.

BRANCH UTILITIES:

Fuel Oil Storage

- 900 gallon tank in rear of the building.

Liquid Propane Storage

- 4 TO 8 Thirty-three pound tanks on site

Natural Gas

None of site

Water Mains

- (1) Water mains are all located in southeast corner of the plant.
- (1) FDC connection located at backflow prevention housing.

Contingency Plan and Potential Hazards

The purpose of this Contingency Plan is to assure that the JCI Milford Branch has a site specific emergency plan of action that is designed to minimize hazards to human health or the environment from fires, flooding, explosions, unplanned releases of hazardous materials, personnel injuries, accidents, loss of power, or even an unexpected weather event that could potentially result in a release of material to the air, soil, surface waters or ground water.

Clearly, it is impossible within the scope of this written plan to outline all the procedures to take in response to every conceivable scenario that can arise requiring the activation of the Branch Contingency Plan. The Contingency Plan is designed to address expected and predicted incidents that can feasibly be expected to possible occur at a JCI Branch location. As a facility dealing with hazardous materials in an industrial application, it is reasonably conceivable that any of the following issues may one day arise resulting in having to activate the full Branch Contingency Plan or even a small portion of the plan.

- Fire
- Flooding
- Unintentional Release of Hazardous Materials
- Spill of Hazardous Materials
- Spill of Hazardous Waste
- Sudden Loss of Power
- Unexpected Weather Related Event
- Vehicle Accident
- Explosion
- Personnel Injury

In the event one of these issues should arise, it is the responsibility of the Emergency Coordinator or ranking supervisor on duty to quickly and responsibly determine whether or not the branch personnel currently on site are capable of responding to the emergency, whether addition emergency services assistance is required, or whether an evacuation of the facility must be initiated. It is also the responsibility of the Emergency Coordinator to determine whether to activate the entire contingency plan or a small portion of the plan.

In the event that emergency response procedures cannot be conducted by JCI personnel, the response will be performed by appropriate off-site emergency response agencies. JCI response teams are set up to work independently or in conjunction with off-site response agencies depending on the size of the incident and the specific manpower capabilities available. JCI's response teams are not commercial hazmat teams or clean up companies and will only respond to incidents specific to the chemicals carried at our facilities.

POST INCIDENT:

In any situation in which the Contingency Plan must be activated, the following must be initiated before normal operations can be resumed:

Within (48) hours of an accident, unintentional release, personnel injury or major process upset, an accident investigation will be initiated to determine the cause of the incident and to identify what should be done to prevent its reoccurrence.

Prior to resuming normal operations, the Emergency Coordinator and Safety Coordinator will assess and replace all necessary emergency response equipment, personal protective equipment, and neutralization products used.

As soon as feasible, the Emergency Coordinator will instruct personnel to resume normal operations. Only the Emergency Coordinator is authorized to give this order.

Emergency Response Team

In the case of an emergency, notify the following JCI Jones Chemicals, Inc. Emergency Response Team members:

EMERGENCY COORDINATOR:
Mike Washington
2 Tacoma Ct
Ruther Glen, VA
804-572-8381 (h) / 804-994-4469 (c)

ALTERNATES:
James Wright
16404 Braswell St
Bowling Green, VA
804-994-4468

HAZARDOUS WASTE EMERGENCY COORDINATOR:
Mike Washington
2 Tacoma Ct
Ruther Glen, VA
804-572-8381 (h) / 804-994-4469 (c)

James Wright (Alternate)
16404 Braswell St
Bowling Green, VA
804-994-4468

SAFETY OFFICER: Mike Washington/James Wright

DECONTAMINATION: Gary Kohr

SITE SECURITY: Gary Kohr

MUSTER PERSON: Cortney Johnson

RESPONDERS: James Wright, Jeremiah Dawson

Emergency Response Team and Responsibilities

In an effort to mitigate and control unforeseen spills and or releases, JCI Jones Chemicals, Inc. has elected to train and maintain an 'In House' Emergency Response Team. The primary responsibility of the response team is to investigate, mitigate and control unexpected releases or spills of hazardous materials commonly used at JCI Jones Chemicals, Inc. facilities. JCI is not a commercial response or clean up company and will only respond to incidents involving the core chemicals used at its facility.

All JCI personnel serve in some capacity on the Company's Emergency Response Team. Personnel designated as emergency responders, Emergency Coordinators, Safety Officers or assigned to the decon team, will receive training to the Hazardous Material Technician and or Hazardous Specialist Level. The emergency response team is set up to work independently or in conjunction with outside agencies as specific situations dictate. The team positions and responsibilities are as follow:

EMERGENCY COORDINATOR: Mike Washington / James Wright

The Emergency Coordinator (EC) will activate the general alarm and warn all plant personnel of a problem. If the plant Emergency E-stop has not been activated, the Emergency Coordinator will activate or have the E-Stop activated. ***Note: All Branch personnel have the authority to activate the Plant Emergency E-stop in any type emergency situation.*** The Emergency Coordinator will quickly assess the situation to determine if the issue can be resolved by the facility's Emergency Response Team or whether a Branch evacuation and or additional assistance is needed. The Emergency Coordinator will assume command of the situation until relieved by the Emergency Services-Incident Commander. The EC will then stand by to coordinate all emergency activities with the Incident Commander if requested.

SAFETY OFFICER: Mike Washington/James Wright

The Safety Officer is responsible for ensuring safety of all emergency responders and the plant personnel not involved in the actual response. The Safety Officer (SO) will assist in the development of the Site Safety Plan and will advise the Emergency

Coordinator on all aspects of health and safety. The SO will ensure that the E-Stop has been activated and that 911 or equivalent has been called upon hearing the in-plant general alarm or as directed by **the** Emergency Coordinator.

RESPONDERS: James Wright, Jeremiah Dawson, Mike Washington

The Responders will be broken down into two teams (Team #1 and Team #2) assigned by the Emergency Coordinator. Two members of each team will don proper PPE as directed by the Emergency Coordinator. Team 1 will be the primary responders with Team 2 in reserve for backup.

The primary responsibility of the first team will be to investigate the source of the problem and then mitigate and or secure the leaking material. This could involve closing a key valve, rotating a container, applying an emergency capping kit, plugging a hole or any other activity that will stop the source of the leak. They will isolate, contain, and/or repair the emergency as directed by the EC or IC.

The reserve (Back up) team will be partially dressed out and will stand-by to render assistance or affect an evacuation as needed. In the event the primary team is not able to completely secure the release, they are to exit the leak and the reserve team will then continue the effort.

Note: If all personnel or visitors cannot be accounted for, the primary team's first responsibility will be to search and locate them as directed by the Emergency Coordinator.

Response procedures to a compressed gas release initiated by Branch personnel are only permitted if two full teams (two persons each) are on site and are prepared to suit up and personnel are available to conduct decontamination procedures.

DECONTAMINATION: Gary Kohr

The primary responsibility of the decontamination team is to provide decontamination for plant personnel until relieved by Emergency Services or other appropriate support agency.

The decontamination team will set up the decontamination zone in an area determined by the Emergency Coordinator. Their responsibilities will include setting up hot, warm, and cold zones and the safe decontamination of Emergency Response Teams and the control of the decontamination area. Every effort will be made to collect, contain and properly dispose of any and all waste generated from decontamination efforts.

SITE SECURITY: Gary Kohr

It will be the responsibility of security personnel to protect the plant and personal property of JCI Jones Chemicals and its employees.

The security personnel will immediately proceed to the designated staging area (depending on the wind) and keep unauthorized personnel off of JCI property during the emergency. The security personnel will only permit emergency personnel (fire, Police, hazmat, etc.) to enter JCI property. The Site Security personnel will also inform company drivers who may be returning to the plant to seek safe harbor until the all clear is given. Visitors, customers, vendors, and or media personnel will be escorted off the facility grounds and no one, to include JCI personnel, will be allowed to enter the plant until the Emergency Coordinator gives the "all clear" sign.

MUSTER PERSON: Cortney Johnson

It will be the job of the muster personnel to account for all plant and office employees, including customers and or vendors that may be on the premises. Upon hearing the alarm, the muster personnel will move to the proper designated staging area. The muster personnel will take the Visitor's Sign-in Log and a copy of the Contingency Plan. The muster person is responsible for accounting for all employees and visitors. The muster person will notify the emergency coordinator that either all personnel are accounted for or that (names) are missing.

ALL OTHER PERSONNEL:

All other personnel that are not assigned to a specific duty will evacuate the plant and move in a safe manner, utilizing the emergency escape respirators, if necessary, to one of the two designated

staging areas. They will remain there until the Emergency Coordinator gives the "all clear" sign.

COMMUNICATIONS:

General communications within the plant facility are handled via the plant intercom system. Communication with office and drivers is handled via cell phone or with the two-way communication function on the cell phone (Nextel).

Management personnel, maintenance, and drivers are equipped with company cell phones. All company cell phones are to be working and available for calls.

Emergency response communications is handled with company supplied two way radios. Two-way radios are staged in or around the emergency response staging area. Radios are to be kept changed and ready for use at all times. Company supplied radios are not to be removed from the plant premises.

The Emergency Coordinator will select an available primary and secondary channel at the time of an incident based off interfering traffic. All radio communications are to be short and to the point. Basic hand signals can also be used as a backup to a failed radio while on scene. The Milford facility has (4) radios dedicated to Emergency Response.

Communications with Emergency services and neighbors will be handled via cell phone.

LOCAL EMERGENCY SUPPORT:

JCI Jones Chemicals, Inc. relies heavily on outside emergency response agencies to assist with incidents beyond the capabilities of the facility personnel. As part of the Company's pre-planning requirements, mutual agreements or 'Memorandums of Understanding' have been developed with various emergency services agencies. As part of these agreements, JCI supplies the various agencies with a copy of the Branch's Contingency Plan and sends the agency updates to the Plan as they occur. These updates are sent via registered mail-receipt request, to ensure the updates have been delivered.

At a minimum, the following agencies are to be provided with copies of the Branch Contingency Plan:

- Local Emergency Planning Committee.
- State Emergency Response Commission.
- Local Fire / Hazmat Department.
- Local Police Department.
- Local Hospital to which employees might be transported.

Potential Hazard: Fire

Current Prevention Equipment and or Policy:

- Pre-positioned fire extinguishers throughout the plant.
- Pre-positioned smoke detectors in offices and common spaces.
- Designated flammable cabinets.
- Minimal flammable products on hand at the **B**ranch.
- Hot work permits used for all hot work activities.

General Actions:

- Sound the plant general alarm.
- Suspend all plant operations.
- Activate the Emergency E-stop.
- Initiate **an** emergency shutdown if possible.

Specific Actions - Small Incidents:

- Evacuate immediate vicinity of fire.
- Isolate and contain fire.
- Secure power in the event of an electrical fire.
- Extinguish the fire with fire extinguishers.
- Overhaul and set re-flash watch.

Specific Action - Other than Small Incidents:

- Call 911.
- Isolate and contain area - if possible.
- Evacuate building to pre-designated staging area.
- Removed ERT equipment.
- Remove Visitor's Log and account for all visitors and employees.
- Prepare for loss of power.
- Plant Emergency Coordinator meets Incident Commander at the gate to brief emergency situation.
- Response Team on standby to respond to container leaks if called upon by Incident Commander.

Potential Hazard: Flooding

Current Prevention Equipment and or Policy:

- Plant located on low ground thereby increasing the risk of flooding.
- Chiller, cooling tower, water tanks all located off ground on platforms.
- Tanks are secured in indoor dikes.
- Heavy weather pre-planning.

General Actions:

- Sound the plant general alarm.
- Suspend all plant operations.
- Activate the Emergency E-stop.
- Initiate an emergency shutdown if possible.

Specific Actions:

- Close all doors to the plant.
- Secure power in affected areas.
- Ensure all tanks are turned off.
- Conduct outdoor container count if possible.
- Prepare for loss of power.

Potential Hazard: Unintentional Release of Hazardous Materials

Current Prevention Equipment and or Policy:

- Gas Detection System with automatic shutdown function.
- Vat Control System with automatic shutdown function.
- Strategically placed E-stops throughout the facility with automatic shutdown function.
- A, B, and C - Kits located in facility.
- Cylinder Recovery Vessels located in facility.
- Plant blow and vacuum systems.
- Trained plant emergency response team.

General Actions:

- Sound the plant general alarm.
- Suspend all plant operations.
- Activate the Emergency E-stop.
- Initiate an emergency shutdown if possible.

Specific Actions - Small Incidents:

- Isolate and contain.
- Correct the problem.

Specific Actions - Large Incidents:

- Call 911.
- Isolate and contain the area, if possible.
- Evacuate building to pre-designated staging area.
- Remove Visitor's Log and account for all visitors and employees.
- Prepare for loss of power.
- Plant Emergency Coordinator meets Incident Commander at gate to brief emergency situation.
- Response Team to respond to release if adequate number of responders are on hand at the facility and the release can be reasonably controlled or secured. If not, continue as discussed below.
- Response Team is on standby to respond to container leaks if called upon by Incident Commander.

Potential Hazard: Spill of Hazardous Materials

Current Prevention Equipment and or Policy:

- Tank diking.
- Attendance policy for loading and unloading of tankers.
- Truck and drum loading on impervious surfaces.
- Hi - Low level - tank alarms.
- Double contained hoses.
- Only top unloading of railcars.
- Spill pallets.
- Drum testing policy prior to filling.
- Overpack drums on hand at facility.

General Actions:

- Sound the plant general alarm.
- Suspend all plant operation.
- Activate the Emergency E-stop.
- Initiate an emergency shutdown if possible.

Specific Actions - Small Incidents:

- Isolate and contain.
- Correct the problem.
- Overpack the drum if necessary.

Specific Actions - Large Incidents:

- Call 911.
- Isolate and contain.
- Emergency response team will plug and patch if possible.
- Transfer leaking product to other tanks or tankers if possible.
- If release is to public waters or storm sewer, follow state specific reporting guidelines.
- Plant Emergency Coordinator meets Incident Commander at the gate to brief emergency situation.

Potential Hazard: Spill of Hazardous Waste

Current Prevention Equipment and or Policy:

- Designated storage area for waste (satellite station or waste storage area).
- Minimal waste stored on site. (Normally only bead blast residue material.)
- Trained plant emergency response team.

General Actions:

- Sound the plant general alarm.
- Suspend all plant operations.
- Activate the Emergency E-stop.
- Initiate an emergency shutdown if possible.

Specific Actions - Small Incidents:

- Isolate and contain.
- Correct the problem.
- Overpack the leaking drum if necessary.

Specific Actions - Large Incidents:

- Call 911.
- Isolate and contain.
- Emergency response team will plug and patch if possible.
- Transfer leaking product to other tanks or tankers if possible.
- If release is to public waters or storm sewer, follow state specific reporting guidelines.
- Plant Emergency Coordinator meets Incident Commander at the gate to brief emergency situation.

Potential Hazard: Sudden Loss of Power

Current Prevention Equipment and or Policy:

General Actions:

- Suspend all plant operations.
- Shutdown blow system valves going into vats.
- Secure valves to isolate remaining air in air tanks.
- Secure valves to vacuum ton(s) and isolate remaining vacuum in vacuum tanks.

Specific Actions:

- Check temperature in vats to ensure vats are still cold.
- Relieve all pressure on all liquid lines (Chlorine) into empty tons. (If actuated valves are closed, remove actuator and manually open.)
- Monitor temperature in the vats with handheld thermometers.
- Excess blow pressure can be relieved into the vats if carefully monitored and sufficient cooling is still somewhat available.
- Portable air tanks can also be used to open actuated valves to relieve pressure off systems.
- Do not unhook rail cars or compressed gas containers.
- Keep isolated vacuum active for emergencies.
- Notify SRQ of power loss to have phones forwarded to another branch.
- Shut off all unnecessary equipment including the power disconnect and valves to prevent issues resulting from a power surge in the event of a sudden power return.
- If necessary, tractor air can be hooked up to plant air tanks.

Potential Hazard: Unexpected Weather Event (<30 minutes notice)

Current Prevention Equipment and or Policy:

- Strategically placed E-stops throughout facility with automatic shutdown function.
- Diking around tanks.
- Heavy weather pre-planning.

General Actions:

- Sound the plant general alarm.
- Suspend all plant operations.
- Initiate emergency shutdown procedures.
- Blow down compressed gas systems and put system on vacuum.
- Shut down blow system valves going into vats.
- Secure valves to isolate remaining air in air tanks.

Specific Actions:

- Shut all interior and exterior doors.
- Evacuate all visitors if possible or give specific instructions on where to muster inside the facility.
- Shut down all unnecessary equipment (power disconnects).
- Shut down all chemical pumps.
- Seek shelter inside the facility away from windows but close to exits.
- If the facility is hit by a weather event and either damage or a release is detected, call 911.
- Plant Emergency Coordinator meets Incident Commander at the gate to brief emergency situation.

Potential Hazard: On-site Vehicle Accident

Current Prevention Equipment and or Policy:

- Access Control Policy.
- 5 MPH speed limit.
- Vehicle barriers by railcars.
- All visitors are escorted while on Company property.
- Smoking is only allowed in a designated area away from unloading or vehicle areas.

General Actions:

- Sound the plant general alarm.
- Suspend all plant operations.
- Activate the Emergency E-Stop.
- Initiate an emergency shutdown if possible.

Specific Actions:

- Call 911 in the event of an injury, fire or release of hazardous material.
- Find the driver to identify what hazardous materials are present on vehicle.
- Evacuate the driver if possible.
- If possible, turn the truck's ignition off.
- Isolate the immediate area until the hazardous materials on the vehicle are identified. (Use the driver's BOL, truck placards and or container labels.) Refer to: Emergency Response Guidebook - (Orange Book), Cameo, or call Chemtrec for guidance on evacuation and or general response guidelines.
- The emergency response team will not respond to fires, other than small fires capable of being extinguished with a fire extinguisher and only after hazardous materials on vehicle are identified.
- The emergency response team will not open the door or enter a vehicle until all hazardous materials are identified.
- Plant Emergency Coordinator meets Incident Commander at the gate to brief emergency situation.

Potential Hazard: Explosion

Current Prevention Equipment and or Policy:

- Access Control Policy.
- 5 MPH speed limit.
- Vehicle barriers by railcars.
- All visitors are escorted in facility.
- Smoking only allowed in designated area away from unloading or vehicle areas.
- Flammable materials stored in designated areas.

General Actions:

- Sound the plant general alarm.
- Suspend all plant operations.
- Activate the Emergency E-Stop.

Specific Action:

- Call 911
- Initiate evacuation of the facility to pre-determined evacuation area unless otherwise directed by Emergency Coordinator.
- Remove Visitor's Log and account for all visitors and employees.
- If possible, turn off the natural gas at the meter.
- If possible, document any suspicious vehicle and or people in immediate area.
- Prepare for loss of power.
- Prepare for possible crime scene.
- Prepare for multiple releases of hazardous materials.
- Plant Emergency Coordinator meets Incident Commander at the gate to brief emergency situation.

Potential Hazard: Personnel Injury

Current Prevention Equipment and or Policy:

- First aid boxes at facility.
- Two man rule when working with hazardous materials.
- Company required PPE for employees and visitors when in the plant or yard area.

General Actions:

- Sound the plant general alarm.
- Suspend all plant operations.
- Activate the Emergency E-Stop.

Specific Action - Minor Injury:

- Employee can proceed to medical box and administer minor first aid.
- Employee must notify supervisor of the injury, even if minor.
- If injury warrant's more than minor first aid but is not life threatening and the employee is stable, the employee will be taken to the local medical clinic for treatment.

Specific Action - Major Injury, Unknown Injury and the Employee is Unstable:

- Call 911 to request immediate help and provide all know information applicable to the injury.
- If possible, 'Good Samaritan' first aid will be rendered by plant personnel.
- In the event of direct chemical exposure, the appropriate MSDS will be followed until first responders arrive.
- Employees requiring immediate medical treatment will be transported to the hospital via emergency services. At no time will an employee be transported by personal vehicle or allowed to drive themselves.
- Plant Emergency Coordinator meets Incident Commander at the gate to brief emergency situation.

First Aid Measures:

Eye Contact: Immediately flush eyes with plenty of water holding eyelids apart for at least 15-20 minutes.
Remove contact lenses, if present, after the first 5 minutes, then continue flushing the eyes.
Get medical attention immediately.

Skin Contact: Remove contaminated clothing.
Rinse skin immediately with plenty of water for at least 15-20 minutes.
Contact the poison control center or a doctor for treatment advice.

Ingestion: Contact the poison control center or a doctor for immediate treatment advice.
Do not induce vomiting unless told to do so by the poison control center or a doctor.
Do not give anything by month to an unconscious person.

Inhalation: Move person to fresh air.
Remove contaminated clothing.
If the person is not breathing, call 911 and give artificial respiration, preferably by mouth to mouth if possible
Contact the poison control center or a doctor for treatment advice.

Evacuation Plan

If circumstances arise where the safety of Branch personnel or visitors is in jeopardy, the facility may have to be evacuated. Based on sound judgment, experience, and safety considerations, the decision to evacuate the facility will be made by the Emergency Coordinator or Incident Commander in charge of the response. Evacuations will be completed in a safe, orderly, and timely fashion. It is of the utmost importance to account for all personnel and any visitors on the premises.

ALARMS:

The Milford facility has multiple plant and production alarms which are designed to warn and or shut down the facility's operation. However, it should be noted that not all of the plant alarms constitute a plant emergency. It is vitally important as an employee or a visitor to understand that the Milford Branch utilizes installed signal horns as the facility's evacuation alarm. The evacuation alarm is manually operated by pressing on the signal horn (Manual Valve) to any of the (3) signal horns located at each plant emergency exit and sounding a continuous burst. Note: This is not to be confused with the emergency 'alert' alarm which is a single burst of the signal horn. Upon hearing the continuous burst of the evacuation alarms, all personnel and visitors will immediately suspend all operations and proceed to the designated staging area. Office personnel will immediately call 911 and should evacuate with the 'Visitor's Sign-In' log. If safe and feasible, all compressed gas valves should be closed at the work stations prior to evacuating.

DESIGNATED STAGING AREAS:

There are two pre-designated staging areas at the facility. The specific staging area will depend on the size of the leak and the wind direction. The primary staging area will be located at the front gate. The secondary staging area will be located at the parking lot of E.M Gray. If neither staging area is suitable, the Emergency Coordinator and or Incident Commander will assign another staging area. Strategically placed wind socks will assist in determining wind direction. ***Note: All (2) south gate locks and railcar locks have the same combination and this combination is known by all plant employees and drivers (1) front gate has a pad lock all employees has a key and the (1) derail lock has one key which is located in the manager office.*** Once the evacuation has taken place, the

muster person must immediately account for all personnel and visitors and notify the Emergency Coordinator of the results.

EVACUATION ROUTES:

Evacuation routes from the plant and offices should be via the closest lighted exit door as indicated in the plot plan included at the end of this document. All plant personnel and visitors should utilize at a minimum, their assigned 'emergency escape respirator' during the evacuation.

VISITORS:

As part of the sign-in process, all visitors are:

- Notified of the potential hazards on site.
- Issued required visitor's PPE, to include a pocket emergency escape respirator.
- Notified of the facility evacuation alarm.
- Notified of the pre-designated staging areas.
- Notified of the evacuation routes to follow.

In addition, all visitors entering the plant are escorted at all times.

CORPORATE NOTIFICATIONS:

As soon as feasibly possible, the following company personnel or company officials will be informed of the incident:

- Executive VP of Environmental Affairs
- Executive VP of Safety, Security and Regulatory Compliance
- Executive VP of Operations

HAZARDOUS WASTE MANAGEMENT PERSONNEL

JOB TITLE:	EMPLOYEES NAME:
Chief Operator	Mike Washington
Alternate Operator	James Wright

TITLE DESCRIPTIONS:

CHIEF OPERATOR: Facilitates transfer of Hazardous Waste generated into containers for proper disposal. Monitors materials during neutralization. Responsible for Daily Waste Neutralization and Weekly On-Site Inspection Reports and monthly Container Inspection Logs (which includes drums, bulk storage tanks, and other containers, pipes and pumps included in the system).

ALTERNATE OPERATOR: Functions as assistant and back up to Chief Operator position. Description is identical in functions and responsibilities to that of the Chief Operator, with the exception that this operator is the alternate.

TRAINING:

Training is conducted yearly either by a representative of the Corporate Environmental Staff of JCI Jones Chemicals, Inc. or a qualified member of the Milford Branch staff. All Hazardous Waste Emergency Responders must complete appropriate Emergency Response Training plus Hazardous Waste Training as described by JCI's Safety Training Manual.

EMERGENCY RESPONSE:

In the event of a Hazardous Waste spill on site, the following personnel are qualified to take remedial action:

Mike Washington James Wright

The Branch Manager or his/her delegate will notify appropriate corporate and governmental agencies. Prompt remedial action will be taken to mitigate the problem.

LIST OF EMERGENCY EQUIPMENT

RESPONSE EQUIPMENT:

Location	**Items at Station**
#1 - Outside Break room	4 - SCBAs 4 - Encapsulated Suits 0 - Extra tanks 1 - Decon kit

FIRE EXTINGUISHERS: ABC TYPE

Location

#1 Smoking Area
#2 Bleach Room
#3 Branch Manager Office
#4 loading dock
#5 Flammable Area
#6 SO2 Storage Area
#7 Outside Valve room
#8 Maintenance Shop
#9 Warehouse Hallway
#10 Locker room
#11 Chlorine room
#12 Bleach load out area
#13 Boiler room
#14 Outside Caustic Area
#15 Daewoo Forklift
#16 Komatsu Forklift
#17 Spare #1
#18 Spare #2

Full-Face Respirators: Designated plant personnel are assigned full-face respirators. (Cartridge Type)

SELF-CONTAINED BREATHING APPARATUS:

Location	*Quantity*	**Type**
Outside Break room	(4)	Scott

TOTALLY ENCAPSULATED SUITS:

Location	**Quantity**
Outside Break room	(4)

CHLORINE AND SULFUR DIOXIDE CAPPING KITS:

Location	***Quantity***
Outside Break room	(1) A- Kit, (2) B- Kit (1) C-kit

CHLORINE CYLINDER RECOVERY VESSEL: Located in Plant

Rubber Gloves: (4) rubber pair outside break room

Rubber Boots: (4) rubber pair outside break room

Face Shields: (2) located in outside break room

GENERAL ALARM: Sound once for alert, continuously for evacuation.

Location	***Type***
East Exit Door	Air
North Exit Door	Air
South Exit Door	Air
Gas Detection Equipment Area	Air

SAFETY SHOWERS & EYE WASH STATIONS:

Location	*Quantity*	*Type*
Warehouse Vat #1 and #2 area	(1)	Eye Wash & Shower
Flammable Cabinet Area	(1)	Eye Wash & Shower
Bleach load out area	(1)	Eye Wash & Shower
Caustic Tank Farm Area	(1)	Eye Wash & Shower

FIRST AID KITS:

Break Room

OTHER:

Material	*Location*	*Quantity*	*Use*
Decon Kit	Outside Breakroom	(1)	Decontamination

MAINTENANCE AND INSPECTIONS OF RESPONCE EQUIPMENT:

JCI Jones Chemicals, Inc. has set up a preventative maintenance and inspection program for all emergency response equipment. Inspections are conducted monthly and documented on a Monthly Safety & Security Equipment Inspection checklist.

Monthly inspections are conducted by designated plant personnel and reviewed by the Branch Manager. Inspections are based on manufacturer's recommendations, federal or state regulations and or common sense and experience. Any equipment that does not pass inspection or does not work as designed is taken out of service until repaired or replaced. Portable equipment that is found to be deficient is physically removed from the general service area. Fixed equipment such as an eyewash or shower is tagged out until repairs have been made.

Any repairs and or replacement of emergency response equipment must be completed in an expeditious manner. In some cases, repairs to emergency response gear cannot be completed by the Branch due to technical competence issues or required qualifications. In cases such as this, equipment may have to been sent to a qualified off-site repair facility. JCI has a limited amount of extra response equipment, such as SCBAs and in that case the Branch is then required to notify the Executive VP of Safety, Security & Regulatory Compliance so that temporary equipment can be obtained from another JCI Branch.

Emergency Response Training

As a company dealing with hazardous materials, JCI Jones Chemicals, Inc. considers it vital to company sustainability to train, qualify and field emergency response teams at all its locations. In the case of a plant emergency, "Time is of the Essence" and having a trained response team that can mitigate and or stop an incident from progressing is seen as vital to the plant and in the best interests of the company.

In order to field an emergency response team, the company has developed an in-house training program to train, test and certify branch emergency responders.

This in-house training program is designed to teach basic emergency response on both the Hazardous Material Technician and Specialist levels. Both levels of training require a minimum of (24) hours of training. The technician level of training focuses on basic emergency response. The specialist level of training focuses on basic emergency response with extra emphasis on the specific chemicals handled at a JCI location.

The training itself consists of a combination of classroom training, hand-on training and specific drills and exercises geared toward plant operations and the chemicals handled at the facility. Technician Level certification is achieved after an employee has successfully completed all required training and has passed the Technician level written exam. Specialist Level certification is achieved after completing all required training for technician level certification and the passing of both the technician level written exam and the specialist level written exam in accordance with 29 CFR 1910.120(60)(iv)(A)-(I).

With few exceptions, all plant personnel undergo emergency response training however, not all plant personnel qualify for the emergency response team. In addition to achieving Technician or Specialist Level certifications, the employee must also pass a physical exam including a pulmonary function test with no restrictions.

JCI has two methods of training emergency responders and ensuring they receive the (24) hours of required training. JCI utilizes a (3) year training cycle of monthly safety training sessions in which emergency response topics are routinely covered. Each branch is required to conduct a monthly safety training meeting. Meeting

topics are assign monthly based off the company (3) year training program. Attending and participating in all monthly training will result in the required (24) hours of emergency response technical level training.

The company also conducts an on-site 'Emergency Response Team Training' school. This school is a week long program of intense training which allows employees to achieve (24) hours of training in a one week time frame. The topics covered in this school are similar to the topics covered in the (3) year program.

Once hazmat certifications are achieved, employees must also undergo (8) hours response team refresher training annually. The refresher training is in addition to the annual physical, pulmonary function test and respiratory protection training.

DRILLS AND EXERCISE PROCEDURES:

JCI Jones Chemicals, Inc. requires (2) drills at each facility per year. One drill is typically an emergency response drill and the other drill is typically a security drill. Branch Managers however, reserve the right to conduct additional drills to meet specific branch training objectives; i.e., to address specific deficiencies. Drills are to be set up and scripted with specific goals and objectives. Drills are to be properly supervised, with a designated safety monitor to ensure personnel safety. 'Free play' drills are not encouraged or allowed at any time.

Full dress-out, walk through or table top drills are all acceptable type training drills conducted at a typical branch location. Drills are typically short in duration with specific objectives. Post-drill critiques are required to review the 'good and the bad' as soon as possible and practical after a drill.

Some facilities may elect to participate in a larger type emergency exercise involving off-site emergency response agencies. Exercises involving multiple emergency response agencies are typically longer in duration and are more complex, thereby requiring more planning and coordination. Due to the general disruption of business and security concerns that arise when conducting large scale drills, Branch Managers must receive authorization in advance from Senior Management prior to committing either the facility and or its personnel to participate in such an event. As a company, JCI generally supports and encourages participation in such exercises.

Any exercise JCI would host or participate in would require clear goals and objectives. JCI would also require a critique of the exercise results.

BULK STORAGE TANKS

Tank # 1	Caustic Soda 50%	(UN1824)	11,000 gal	Steel
Tank # 2	Caustic Soda 50%	(UN1824)	11,000 gal	Steel
Tank # 3	Caustic Soda 25%	(UN1824)	10,000 gal	Steel
Tank # 4	Sodium Hypochlorite	(UN1791)	5,600 gal	Poly
Tank # 5	Sodium Hypochlorite	(UN1791)	5,600 gal	Poly
Tank # 6	Water		1,000 gal	Poly
Tank # 7	Water		1,400 gal	Poly
Tank # 8	Extra tank - Never been in service			Steel

Revised site plan 2/14/11
Sara Title III

JCI Jones Chemicals
Milford, Virginia